

PARKER POHL LLP

99 Park Avenue
Suite 1510
New York, NY 10016
T 212-202-8886
F 646-924-3100
parkerpohl.com

Shelly L. Friedland
shelly.friedland@parkerpohl.com

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VIA ECF

Hon. Jennifer Willis
United States Magistrate Judge
Southern District of New York
40 Foley Square, Room 425
New York, NY 10007

Re: **Opposition to Defense Request for Adjournment of Settlement Conference**
Brockmole et al v. EZ Festivals LLC et al., 1:23-CV-08106-VM

Dear Magistrate Judge Willis,

On behalf of Plaintiffs Anthony Palie, Daokta Bedell, Carl Corbo, Annabel Gould, Dolores Thompson, and Bridgette Winkelman (in the matter originally filed under 1:23-cv-08422), we write to respond to Defendants' request to adjourn the settlement conference.

We concur with our colleagues (Mr. Corbett and Mr. Squitieri) in opposing the proposed adjournment, and with Mr. Squitieri's proposal to impose a schedule to ensure that settlement discussions progress if the settlement conference is adjourned. We would further suggest implementing a strict schedule to move discovery forward, with Defendants committing to produce their communications, vendor contracts, and other files stored on their shared drive by a date certain. (Plaintiffs will commit to beginning production as well; however, as Mr. Corbett has pointed out, there is little in Plaintiffs' documents that will have a material impact on the parties' assessments of the merits of the claims.)

We look forward to discussing these matters with Your Honor later today.

Respectfully submitted,


Shelly L. Friedland